

ORAL ARGUMENT NOT YET SCHEDULED

No. 15-5170

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

SAFARI CLUB INTERNATIONAL, *et al.*,
Plaintiffs-Appellants

v.

SALLY JEWELL, in her official capacity as
United States Secretary of the Interior, *et al.*,
Defendants-Appellees

On Appeal from the United States District Court for the District of Columbia
(No. 14-00670)

**UNOPPOSED MOTION FOR 60-DAY EXTENSION OF TIME
TO FILE OPENING BRIEF**

Plaintiffs-Appellants, Safari Club International and National Rifle
Association of America (SCI/NRA), respectfully move this Court for a 60-day
extension of time in which to file their opening brief for the purpose of pursuing
mediation. Federal Defendants-Appellees consent to this motion.¹ The mediator
assigned to the case concurs in this request.

¹ Although Friends of Animals and Zimbabwe Conservation Task Force have been identified by the clerk on the docket of this appeal as “Intervenor for Defendant-

Plaintiffs-Appellants SCI/NRA have not previously sought an extension of time in which to file their brief.

The reason for this motion, as set forth more fully in the attached declaration, is to allow time for the parties to discuss potential settlement and the resolution of this appeal through mediation. The extension would allow the parties to explore mediation without expending resources preparing and filing briefs. If the case settles, there will be no need for briefing. If it does not settle, the parties can recommence briefing.

The parties request that the new briefing schedule be as follows:

Opening Brief for SCI/NRA Plaintiffs-Appellants 1/15/16

Brief for Federal Defendants-Appellees 2/15/16

Reply Brief for SCI/NRA Plaintiffs-Appellants 3/01/16

Deferred Appendix 3/08/16

Final Briefs 3/22/16

Appellee,” that entry is incorrect. These two organizations only intervened in the District Court in the portion of the case that is continuing in the court below. Friends of Animals and the Zimbabwe Conservation Task Force did not intervene in the court below until after the District Court issued the ruling that is the subject of this appeal. For that reason, neither Friends of Animals nor the Zimbabwe Conservation Task Force are parties to this appeal and for that reason, their counsel was not consulted for the filing of this motion for an extension.

This schedule is based on the timing between briefs set forth in the briefing schedule established by this Court in its Order dated October 6, 2015.

WHEREFORE, Plaintiffs-Appellants SCI/NRA respectfully move this Court to grant the requested unopposed 60-day extension for the filing of their opening brief and to adopt the new briefing schedule.

Dated: November 3, 2015

Respectfully submitted,

/s/ Anna M. Seidman

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 3rd day of November, 2015, a true and correct copy of Motion for an Extension by Plaintiffs-Appellants was electronically filed through the CM/ECF system, which caused all parties to be served by electronic means, as more fully reflected in the Notice of Electronic Filing.

/s/ Douglas S. Burdin
Douglas S. Burdin

Counsel for Plaintiff-Appellant
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